

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

DAVID KUHLMAN, individually and on behalf of all others similarly situated,

Plaintiff,

v.

HCF MANAGEMENT, INC., and HCF OF FAIRVIEW, INC., d/b/a FAIRVIEW MANOR,

Defendant.

Case No.: 3:25-cv-111

**CLASS ACTION COMPLAINT
DEMAND FOR JURY TRIAL**

PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

PLEASE TAKE NOTICE THAT, pursuant to Fed. R. Civ. P. 41(a)(1)(A), Plaintiff David Kuhlman, individually and on behalf of all others similarly situated (“Plaintiff”) hereby voluntarily dismisses Defendants HCF Management, Inc. and HCF of Fairview, Inc. d/b/a Fairview Manor, (“Defendants”) without prejudice.

Date: March 4, 2025,

Respectfully submitted,

/s/Joshua Sanford
Joshua Sanford
Arkansas Bar No. 2001037
josh@sanfordlaw.com
SANFORD LAW FIRM, PLLC
10800 Financial Centre Pkwy, Suite 510
Little Rock, Arkansas 72211
Phone: (501) 221-0088

Leigh S. Montgomery
Texas Bar No. 24052214
lmontgomery@eksm.com
EKSM, LLP
4200 Montrose Blvd., Suite 200
Houston, Texas 77006
Phone: (888) 350-3931
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on March 4, 2025, a copy of the foregoing document was filed and served on all parties in accordance with the protocols for e-filing in the Federal Rules of Civil Procedure.

/s/Joshua Sanford
Joshua Sanford